

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Lisa R. Lombardo	:	
Debtor	:	Case No. 19-23257 CMB
	:	Chapter 13
PNC Bank, N.A.	:	Related to Claim No. 6
Movant	:	
vs.	:	
Lisa R. Lombardo	:	
and Ronda J. Winnecour,	:	
	:	
Respondents	:	

DECLARATION THAT EXISTING CHAPTER 13 PLAN IS SUFFICIENT

And now comes counsel for the Debtor and declares that the existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt.

Contemporaneously with the filing of this declaration, the Chapter 13 Trustee and the affected creditor have been served with a copy of this declaration.

Dated: July 25, 2023

Respectfully submitted:

/s/Mary Bower Sheats
Mary Bower Sheats, Esquire
PA ID#27911
1195 Washington Pike
Suite 325
Bridgeville, PA 15017
412-281-7266
Mary@mbsheatslaw.com